

In the United States District Court
For the Northern District of Texas
Dallas Division

John T. Lamont and Preston	§	
Poulter	§	
Plaintiffs	§	
	§	No. 3:21-cv-1176-K-BN
v.	§	
	§	
Dean Assaf et al.	§	
Defendants	§	

Plaintiffs' Proposed Voir Dire Questions

Pursuant to Fed. R. Civ. P. 47, Plaintiffs respectfully request that the Court make the following inquiries of the panel:

1. Whether any potential juror has a personal connection to child pornography, such as friends or family members having been victims or otherwise been involved in the creation or consumption of child pornography;
2. Whether any potential juror has a personal connection to sexual abuse of children
3. Whether any potential jurors have strong feelings about the First Amendment and the freedom of speech
4. Whether any potential jurors are comic book enthusiasts or have heard of any of the players involved, including:
 - a. The present parties;
 - b. Ethan Van Sciver;
 - c. Victoria Kundert; and/or
 - d. Comicsgate.

Respectfully submitted,

/s/ Jeremy M. Masten

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Counsel for Plaintiffs

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served on all parties through the Court's CM/ECF system, including those listed below, on August 14, 2023.

Dean Assaf
Aliassaf959@gmail.com

Pro se defendant

/s/ Jeremy M. Masten
Jeremy M. Masten